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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUL 22 2008
JUL 22, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

JOHN KEEFER

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case N
(To be)

08CV4152

JUDGE DER YEGHIAYAN
MAG. JUDGE MASON

Thomas J Dart

Salvador Godinez

Will Thomas

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐ OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: John Keeler
- B. List all aliases: John Fitzgerald, Willie Keeler, John Keeler
- C. Prisoner identification number: 20070016247
- D. Place of present confinement: COOK COUNTY Jail
- E. Address: P.O. Box 089402

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Thomas J. Dart
 Title: Sheriff of Cook County, Jail
 Place of Employment: 50 W. Washington Room 704
- B. Defendant: Salvador Godinez
 Title: Executive Director
 Place of Employment: 2700 S. California
- C. Defendant: Will Thomas
 Title: Superintendent Division 9
 Place of Employment: 2700 S. California

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: ARAMARK CORPORATION
08CV2740
- B. Approximate date of filing lawsuit: May 7, 08
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: ARAMARK CORPORATION

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT OF ILLINOIS
- F. Name of judge to whom case was assigned: Judge DER-YEGHIAIAN
- G. Basic claim made: Violation my Civil Right
Rights And Embezzling money
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): was dismissed, But with a
appealed.
- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Detainee Keeler noticed while being housed in protected custody. Executive Director S. Godinez has made a policy here at Cook County Jail that violated my constitutional rights. By not allowing me access to call my attorney, who ^{is} was my Assistant Public Defender to talk my case over. The leaves that was order, by Exec Director Godinez. To let me out my cell was, 7:30 a.m. to 10:30 a.m. the next day 4:00 p.m. to 6:30 p.m. ^{knowing} ~~order~~ing these the leaves my attorney will be in court or gone home for the day. therefore, this is not giving me anytime. I've asked the sergeants and lieutenants. on 7-3. could i use the phone ~~was~~ and was told per Godinez. if i couldn't get

in touch with my Attorney while
 out during my Day Room time, I'll
 be shut out of work. I've wrote the
 Superintendent Thomas And he refused
 to acknowledge saying no. Because he
 don't give out special privileges.
 This have been wrote up once before.
 I've written to the Sheriff Thomas J.
 Dact about Director Godinez
 misconduct and he refused to stop
 Godinez from making a policy that
 will violate ^{my} rights. Also the other way
 Godinez have it sealed up where we
 can't call my Attorney is by what
 they call power working which starts
 at 3:30 pm. To 8:00 pm. clearing
 the work room to keep us in our
 cells to try to justify not letting
 me out. However, general population is
 allowed out from 7:30 a.m. to 1:30 p.m. then
 at 3:30 pm to 6:30 pm, from 6:30 p.m.
 to 9:30 p.m. which I find this also
 Discrimination against me.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

That I be compensated 250,000 For
Staffing and stress and for violation
my Federal Rights. And Constitutional
Rights Also Change the time out cells
in order to call Attorneys and violation
Departmental Rules and Regulation

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this _____ day of _____, 20 08

John Keeler
 (Signature of plaintiff or plaintiffs)

John Keeler
 (Print name)

20070016247
 (I.D. Number)

P.O. Box 089002

Chicago IL 60608

(Address)

Part-A / Control #: XReferred To: D:19/2008☒ Processed as a request.

COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: Keller First Name: JohnID #: 2007-0011247 Div.: 9 Living Unit: 3B Date: 7/23/08

BRIEF SUMMARY OF THE COMPLAINT: Detainee Keller stated
while being in the Cook County Jail, the
Exec Director S. Godinez has made a policy
that at Cook County Jail that has violated
my Constitutional Rights. By not allowing me
access to my cell my attorney due to the
hours in my cell. Detainee Keller is allowed
cell call 7:30 am to 10:30 am on one day,
the next day from 4:00 pm to 6:30 pm.
Not giving me a right to call my attorney.
Exec Director S. Godinez passed this policy
from prison where he was arrested at. On the 10th Day

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

the whole Cook County Jail
 ACTION THAT YOU ARE REQUESTING:

that i be compensated 100,000 for not starting
and stop violation my Constitutional Rights

DETAINEE SIGNATURE: John KellerC.R.W.'S SIGNATURE: [Signature]DATE C.R.W. RECEIVED: 7/25/08

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form.
 All appeals must be made in writing and directly submitted to the Superintendent.

C.C.D.O.C. DETAINEE GRIEVANCE FORM PROCESSED AS A REQUEST

Please Note :

- If the detainee is not satisfied with the response and/or attempt at resolving this issue, the detainee may resubmit the concern and it will be processed as a grievance.
- When processed as a request, an appeal of the response and/or action taken cannot be made.
 - When processed as a request, PART-B is not applicable.

Detainee's Last Name: Kee/ER First Name: John

ID#: 07-0014247 Div: 9 Tier/Living Unit: 3B

Date of Request: 5/22/08 Date C.R.W. Received Request: 6/1/08

This request has been processed by: J. Butler C.R.W.

Summary of Request:

Detainee request assistance regarding being allowed
to call his attorney

Response and/or Action Taken:

Detainees are allowed phones out on both the 73 and
3-11 shift on an alternating schedule. For specific times and
needs for phone calls those needs should be addressed with
possibly supervisor for a review of the phone out schedule
will be done to make sure policy is being followed by staff.

C. J. White
(Print- name of individual responding)

C. J. White
(Signature of individual responding)

Date: 6/10/08 Div./Dept. 9

Part-A / Control #:

Referred To:

☒ Processed as a request.**COOK COUNTY DEPARTMENT OF CORRECTIONS
DETAINEE GRIEVANCE**

36 3288 307

Detainee Last Name: Keller First Name: JohnID #: 2001 - 00116247 Div.: 9 Living Unit: 3B Date: 5/23/08BRIEF SUMMARY OF THE COMPLAINT: on 5/23/08 Detainee Keller

called to call my attorney, Mr. Hall, and
was denied. The unit nurse officer who worked
Division 9 3B was told that the officer came
down for lunch and Director Guadinez to supt.
from the city Detainee could use the phone
and the nurse said this is not my first time
filing a grievance on this matter and on 5/23/08
and nurse said anything back. Detainee Keller
informed this is discrimination at it has due to
one part of the jail it has 18 and the other
are 3 and 21 hours. I am being denied in prison's custody.

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

ACTION THAT YOU ARE REQUESTING:

DETAINEE SIGNATURE: John KellerC.R.W.'S SIGNATURE: V. MillerDATE C.R.W. RECEIVED: 6/19/08

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All appeals must be made in writing and directly submitted to the Superintendent.

Part-A / Control #:

Referred To:

☒ Processed as a request.

COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: KEELER First Name: JohnID #: 2007-0016247 Div.: 9 Living Unit: 3B Date: 6/10/08BRIEF SUMMARY OF THE COMPLAINT: Where I am only allowedcell my cell some days for one hour and
some days 3 hours a day; during different
times some day might be 7:30 a.m. to 8:30
a.m. the next day 7:00 p.m. to 6:30 p.m.I have seen this is a violation as well.
Discrimination; Cause population is allowed
all from 7:30 a.m. to 10:30 a.m. then from
10:30 ^{11:00} to 1:30 p.m., 3:30 p.m. to 6:30 p.m.,
6:30 p.m. to 9:30 p.m. However Director Gaudin
and Superintendent Thomas is not allowingme access to my attorney. I'm sure they will

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

We security division is not allowing visit to the violation my
right.

ACTION THAT YOU ARE REQUESTING:

that I be allowed to call my attorney. And be
compensate for my suffering. 250,000DETAINEE SIGNATURE: John KeelerC.R.W.'S SIGNATURE: V. LittleDATE C.R.W. RECEIVED: 6/19/08

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